

LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Amalia Reyes

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

LILIAM URRUTIA and VANESSA
DORANTEZ GALICIA, as aggrieved
employees pursuant to the Private Attorneys
General Act (“PAGA”), on behalf of the State
of California and other aggrieved employees,

Plaintiffs,

vs.

SHAHS OF SHIRAZ, INC., a California
corporation; BUNCH OF BULL, INC., a
California corporation; CENTRAL VALLEY
FAST FOODS, INC., a California corporation;
EUREKA FAST FOODS CORP., a California
corporation; EUREKA FORTUNE, INC., a
California corporation; QSR WEST, INC., a
California corporation; QSR WEST
BUILDING, LLC, a California limited liability
company; QSR WEST DEVELOPMENT
ONE, INC., a California corporation; QSR
WEST DEVELOPMENT, LLC, a California
limited liability company; and DOES 1 through
10, inclusive.

Defendants.

Case No.: MSC21-01804

Honorable Charles S. Treat
Department 12

**DECLARATION OF EDWIN AIWAZIAN
IN SUPPORT OF PLAINTIFFS’
MOTION FOR COURT APPROVAL OF
THE PARTIES’
PAGA SETTLEMENT**

Date: TBD
Time: TBD
Department: 12

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Amalia Reyes (“Plaintiff Reyes”) in the action entitled *Amalia Reyes v. Bunch of Bull, Inc. et al.*, Alameda County Case No. 21CV002239 (“Reyes Action”), which is being settled along with *Liliam Urrutia, et al. v. Shahs of Shiraz, Inc., et al.*, Contra County Case No. MSC21-01804 (“Urrutia Action”) (together, the Reyes Action and Urrutia Action are referred to as the “Actions”). The facts set forth in this declaration are within my personal knowledge or based on information and belief and, if called as a witness, I could and would competently testify thereto.

SUMMARY OF WORK PERFORMED

2. Plaintiff Reyes has satisfied the prerequisites under California Labor Code section 2699.3(a), including, and not limited to, providing the California Labor and Workforce Development Agency (“LWDA”) and the employers with written notice of the specific provisions of the California Labor Code that are alleged to have been violated, including the facts and theories to support the alleged violations, by way of written correspondence on September 1, 2021. The notice was sent by U.S. Certified Mail to the employers and the notice was submitted to the LWDA by way of online submission on the LWDA’s website. The LWDA did not respond to the notice letter that was sent on behalf of Plaintiff Reyes. A true and correct copy of the September 1, 2021 notice letter is attached hereto as “**EXHIBIT 1.**”

3. I have been actively engaged in this litigation from the inception of the Reyes Action, which was filed on November 9, 2021, as have several other attorneys and staff members at our firm. Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency of the Reyes Action. Lawyers *for* Justice, PC joined forces with other plaintiffs’ counsel, Capstone Law APC, that commenced the above-captioned earlier filed case (i.e., the Urrutia Action) (together, the firms are referred to as “Plaintiffs’ Counsel”), to coordinate litigation efforts, and Lawyers *for* Justice, PC has actively participated in the mediation and settlement process that resulted in the resolution of the Actions.

1 4. Before initiating the *Reyes* Action, Lawyers *for* Justice, PC conducted extensive
2 investigation and research into the facts and circumstances underlying the pertinent factual and
3 legal issues and applicable law. This required thorough discussions and interviews between
4 attorneys at our firm and Plaintiff Reyes, and research into the various legal issues involved in
5 the *Reyes* Action, namely, the current state of the law as it applied to off-the-clock theory, meal
6 and rest periods, Private Attorneys General Act (“PAGA”) claims, wage-and-hour enforcement,
7 Plaintiff Reyes’ allegations, and potential defenses. Plaintiff Reyes’s core allegation is that
8 Defendants have violated the California Labor Code by engaging in a uniform practice and
9 procedure, with respect to Plaintiff Reyes and other Aggrieved Employees, of, *inter alia*, failing
10 to pay overtime and minimum wages, failing to provide compliant meal and rest periods and
11 associated premiums, failing to pay timely wages during employment and upon termination of
12 employment, failing to provide complete and accurate itemized wage statements, failing to keep
13 complete and accurate payroll records, and failing to reimburse necessary business-related
14 expenses and costs.

15 5. Lawyers *for* Justice, PC investigated the veracity, strength, and scope of the
16 PAGA claim in the *Reyes* Action, and was also preparing the case for trial, prior to reaching the
17 settlement. Lawyers *for* Justice, PC conducted extensive investigation, research into legal and
18 factual issues, and informal discovery, and review and analysis of a large volume of information,
19 documents, and data. Lawyers *for* Justice, PC also met and conferred with Defendants’ counsel
20 on numerous occasions, e.g., to discuss issues relating to the production of information,
21 documents, and data in the course of litigation and in connection with mediation and settlement
22 discussions. Lawyers *for* Justice, PC also investigated time researching and investigating the
23 applicable law, which is evolving as it relates to PAGA representative actions, arbitration
24 agreements, wage-and-hour enforcement, joint employer/alter ego theory, Plaintiff Reyes’
25 allegations, and Defendants’ defenses thereto, as well as the facts discovered.

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6. After engaging in extensive investigations, informal discovery, and exchange of information, the parties in the Actions participated in settlement negotiations to try to resolve the matter. These efforts included participating in a full-day mediation on August 24, 2022, conducted by Eleanor Barr, a well-respected mediator experienced in mediating complex labor and employment matters. In the course of mediation and settlement negotiations, the parties discussed all aspects of the Actions, including the risks and delays of further litigation and proceeding with trial, as well as the law relating to representative PAGA actions, off-the-clock theory, arbitration agreements, wage-and-hour enforcement, and joint employer/alter ego theory, the evidence produced and analyzed, and the possibility of bifurcation of discovery and/or trial and appeals, among other things. During all settlement discussions, the parties conducted their negotiations at arm's length in an adversarial position.

7. As set forth more fully in the accompanying Motion for Court Approval of the Parties' PAGA Settlement, Plaintiffs' Counsel seeks attorneys' fees in the amount of \$146,533.33, which represents approximately one-third (1/3) of the Gross Settlement Amount, as provided by the Settlement Agreement. Pursuant to the contingency-fee agreement entered into by and between Plaintiff Reyes and Lawyers for Justice, PC, Plaintiff Reyes has agreed to a contingency fee of at least one-third (1/3) of the recovery. The attorneys' fees sought are commensurate with: (1) the risk that Plaintiffs' Counsel took in commencing the cases; (2) the time, effort, and expense that Plaintiffs' Counsel dedicated to the cases; (3) the skill and determination that Plaintiffs' Counsel have shown; (4) the results that Plaintiffs' Counsel have achieved throughout the litigation; (5) value of the settlement that Plaintiffs' Counsel have achieved in the matter; and (6) the other cases that Plaintiffs' Counsel have turned down in order to devote their time and efforts to this matter.

8. I am aware that common and acceptable rates for contingency representation in wage and hour class and representative action litigation are normally in the range from 33.3% to 50%.

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1 9. Attorneys at Lawyers for Justice, PC have spent a total of **224.70 hours**
2 performing tasks to obtain a recovery on behalf of Plaintiff Reyes, the State of California, and
3 the Aggrieved Employees. Attached hereto as “**EXHIBIT 2**” is an Attorney Task and Time
4 Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers for
5 Justice, PC and the time incurred in performing those services. These hours include work done
6 by myself and several other attorneys at the firm. Additionally, Lawyers for Justice, PC had
7 litigation support personnel actively engaged in assisting with the prosecution of the matter,
8 separate from the hours referenced herein.

9 10. The work performed in this particular matter, the background of our firm, as well
10 as the individual backgrounds, training, and experience of the attorneys who worked on this
11 matter, in litigating complex wage-and-hour class and PAGA representative actions, support a
12 reasonable blended hourly rate of compensation at the rate of at least \$700 for work performed
13 by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys’ fees,
14 compensating the firm at the rate of at least \$700 per hour for legal services performed, by courts
15 granting approval of wage and hour class action and/or representative action settlements in other
16 cases: final approval of the class and representative action settlement in *David Dugan v. TEC*
17 *Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on
18 July 8, 2021, and the award of attorneys’ fees involved an hourly rate of \$936.47; final approval
19 of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan*
20 (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award
21 of attorneys’ fees involved an hourly rate of \$919.57; final approval of the class action settlement
22 in *Thereasa Carrozzella v. Basalite Concrete Products, LLC* (Sacramento County Superior Court
23 Case No. 34-2017-00220214-CU-OE-GDS) was granted on February 21, 2020, and the award of
24 attorneys’ fees involved an hourly rate of \$766.05; final approval of the class and representative
25 action settlement in *Alice Rutledge, et al. v. Healthport Technologies, LLC* (Alameda County
26 Superior Court Case No. RG16835813) was granted on June 11, 2019, and the award of
27 attorneys’ fees involved an hourly rate of \$764.82; final approval of the class and representative
28 action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No.

SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved an hourly rate of \$855.96; final approval of the class and representative action settlement in *Stanley Bland, et al. v. Telecare Corporation* (Alameda County Superior Court Case No. RG16811450) was granted on November 21, 2018, and the award of attorneys' fees involved an hourly rate of \$831.38; final approval of the class and representative action settlement in *Maryjo Ungerbuhler Anderson v. Boyett Petroleum* (Stanislaus County Superior Court Case No. 2020582) was granted on May 15, 2018, and the award of attorney's fees involved an hourly rate of \$780.77; and final approval of the class and representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved an hourly rate of \$845.64.

ADEQUACY OF LAWYERS for JUSTICE, PC

EDUCATION

11. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal education and training in dispute resolution and negotiation from the *Straus Institute for Dispute Resolution* as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the *Los Angeles County Superior Court*. In October of 2000, I obtained a Litigation Paralegal Certificate from *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

12. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

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LITIGATION AND REPRESENTATIVE AND CLASS ACTION EXPERIENCE

13. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by *Girardi & Keese*.

14. At *Girardi & Keese*, my practice focused on massive class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition and/or trial.

15. Since its inception in or around October of 2008, *Lawyers for Justice, PC* has almost exclusively focused on the prosecution of consumer and employment representative and class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, *Lawyers for Justice, PC* is the attorney of record in well over a dozen employment-related putative class actions and representative actions in both state and federal courts in the State of California. *Lawyers for Justice, PC* has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, *Lawyers for Justice, PC* has recovered millions of dollars on behalf of thousands of individuals in California.

EXAMPLES OF RESULTS IN REPRESENTATIVE AND CLASS ACTION CASES

16. What follows are just a few examples of the type of results *Lawyers for Justice, PC* (“LFJ”) has achieved on behalf of its clients:

a) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a major property management company involving allegations of misclassification of various “manager” positions. On September 20, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC400414.

b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer of household items involving allegations of misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC413498.

c) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national property management company involving allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC430918.

d) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer involving allegations of misclassification of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class certification. On August 26, 2013, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC424012.

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the class and PAGA representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-273194-LHB.

f) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a national wholesale distributor of plumbing and builder supplies, involving allegations of misclassification of multiple salaried “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2012-00136285.

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1 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
2 wage-and-hour class action against a multinational corporation that provides global workplace
3 solutions, involving allegations of misclassification of the “Operations Manager” position. On
4 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
5 County Superior Court Case Number is BC478769.

6 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
7 wage-and-hour class and PAGA representative action against a national retailer of household
8 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
9 final approval of the class and PAGA representative action settlement. The San Francisco
10 County Superior Court Case Number is CGC-13-532344.

11 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
12 wage-and-hour class and PAGA representative action involving allegations of misclassification
13 of the salaried residential “Property Manager” position. On September 17, 2015, the court
14 granted plaintiff’s motion for class certification. On October 20, 2017, the court granted final
15 approval of the class and PAGA representative action settlement. The Los Angeles County
16 Superior Court Case Number is BC474784.

17 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
18 wage-and-hour class and PAGA representative action against a national retailer of upscale
19 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
20 court granted final approval of the class and PAGA representative action settlement. The Los
21 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
22 Council Coordination Proceeding Number is 4794.

23 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
24 wage-and-hour class action against a national retailer of apparel and fashion accessories, on
25 behalf of non-exempt employees. On August 5, 2016, the court granted final approval of the
26 class action settlement. The Los Angeles County Superior Court Case Number is BC488069.

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1 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
3 involving allegations of misclassification of the “Department Manager” position. On August 12,
4 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
5 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
6 County Superior Court Case Number is RG13680477.

7 m) LFJ represented the plaintiff in a PAGA representative action against a
8 real estate and property management company, on behalf of non-exempt employees. On
9 November 4, 2016, the court granted approval of the PAGA representative action settlement. The
10 Orange County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

11 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
12 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of
13 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
14 PAGA representative action settlement. The San Francisco County Superior Court Case Number
15 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

16 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
17 representative action against a foodservice distributor, on behalf of non-exempt employees. On
18 January 26, 2017, the court granted final approval of the class and PAGA representative action
19 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

20 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
21 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
22 the employer’s motion to compel arbitration, which resulted in a published opinion by the
23 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
24 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
25 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
26 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
27 5046.

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q) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a consumer packaging company, on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC590429.

r) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a manufacturer of food service industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final approval of the class and PAGA representative action settlement. The Orange County Superior Court Case Number is 30-2015-00810013-CU-OE-CXC.

s) LFJ in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a lumber and hardware company on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class and PAGA representative action settlement. The Orange County Superior Court Case Number is 30-2014-00747750-CU-OE-CXC.

t) LFJ represented the plaintiff in a wage-and-hour class and PAGA representative action against a property management company, on behalf of non-exempt employees. On June 14, 2017, the court granted final approval of the class and PAGA representative action settlement. The Los Angeles County Superior Court Case Number is BC586234.

u) LFJ represented the plaintiff in a wage-and-hour class and PAGA representative action against a food company on behalf of non-exempt employees. On June 30, 2017, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175871.

v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a chocolate company on behalf of non-exempt employees. On July 19, 2017, the court granted final approval of the class and PAGA representative action settlement. The Alameda County Superior Court Case Number is RG15764300.

1 w) LFJ represented the plaintiff in a PAGA representative action, against the
2 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
3 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
4 Los Angeles County Superior Court Case Number is BC569664.

5 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
6 representative action against a manufacturer of plastic containers on behalf of non-exempt
7 employees. On October 31, 2017, the court granted final approval of the class and PAGA
8 representative action settlement. The Los Angeles County Superior Court Case Number is
9 BC577233.

10 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
11 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
12 employees. On December 11, 2017, the court granted final approval of the class and PAGA
13 representative action settlement. The Los Angeles County Superior Court Case Number is
14 BC569646.

15 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
16 wage-and-hour class and PAGA representative action against a property management company
17 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
18 approval of the class and PAGA representative action settlement. The Los Angeles County
19 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
20 Number is 4819.

21 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
22 wage-and-hour class and PAGA representative action against a global provider of flexible office
23 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
24 representative action settlement. The Los Angeles County Superior Court Case Number is
25 BC498401.

26 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
27 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
28 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.

The Tulare County Superior Court Case Number is VCU264528.

cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative action against a behavioral health service provider on behalf of non-exempt employees. On November 13, 2018, the court granted final approval of the class and PAGA representative action settlement. The Alameda County Superior Court Case Number is RG16811450.

dd) LFJ, in association with co-counsel therein, represented the plaintiff in a PAGA representative action against a global provider of products and services to the energy industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court granted approval of the PAGA representative action settlement. The Kern County Superior Court Case Number is S-1500-CV-280215-SDC.

ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is 4886.

ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. The Alameda County Superior Court Case Number is RG15757606 and the Judicial Council Coordination Proceeding Number is 4921.

gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a national retailer of apparel and fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the court granted final approval of the class and PAGA representative action settlement. The Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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1 hh) LFJ, in association with co-counsel therein, represents the plaintiff in a
2 wage-and-hour class and PAGA representative action against a medical equipment supplier on
3 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
4 for class certification and certified a class. The San Bernardino County Superior Court Case
5 Number is CIVDS1505744.

6 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
7 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
8 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
9 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
10 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
11 approval of the PAGA representative action settlement. The San Diego County Superior Court
12 Case Number is 34-2015-00175330.

13 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a
14 wage-and-hour class and PAGA representative action against a large national drug testing
15 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
16 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court
17 granted final approval of the class and PAGA representative action settlement. The San Diego
18 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

19 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
20 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
21 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
22 court granted in part the plaintiff's motion for class certification and certified a class. The
23 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
24 Judicial Council Coordination Proceeding Number is 4930.

25 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a
26 wage-and-hour class action against manufacturer and supplier of power products and services on
27 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs'
28 motion for class certification and certified a class. On August 27, 2021, the court granted final

1 approval of the class action settlement. The San Diego County Superior Court Case Number is
2 37-2015-00025968-CU-OE-CTL.

3 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
4 nutritional products manufacturer on behalf of non-exempt production line employees. On
5 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
6 certified a class. The Solano County Superior Court Case Number is FCS051001.

7 **LITIGATION COSTS AND EXPENSES INCURRED BY**

8 **LAWYERS FOR JUSTICE, PC**

9 17. To date, Lawyers *for* Justice, PC has borne all of the risks and costs of litigation
10 and will not receive any compensation until recovery is obtained in the *Reyes* Action. Lawyers
11 *for* Justice, PC seeks reimbursement of \$1,293.17 for litigation costs and expenses incurred in
12 the *Reyes* Action, as reflected in the Case Cost Detail attached hereto as "**EXHIBIT 3.**" These
13 expenses were reasonable and necessary in the prosecution of the *Reyes* Action and to obtain the
14 Settlement.

15 **SERVICE AWARDS TO PLAINTIFFS**

16 18. In recognition of their efforts and work in spearheading the litigation of the
17 Actions, as well as for their broader individual waiver and release of claims with a California
18 Civil Code Section 1542 waiver (set forth in Section 20 of the PAGA Settlement Agreement),
19 the Settlement provides for Service Awards to Plaintiffs Liliam Urrutia, Vanessa Dorantez
20 Galicia, and Amalia Reyes in the amount of \$10,000.00 each to be paid out of the Gross
21 Settlement Amount subject to approval by the Court. The requested Service Awards are fair and
22 appropriate. By initiating and pursuing the *Reyes* Action, Plaintiff Reyes stepped into the shoes
23 of the State of California and undertook the responsibilities of serving in a representative
24 capacity. Plaintiff Reyes has spent a substantial amount of time and effort discussing her
25 employment with her counsel, gathering and producing relevant documents and information, and
26 providing the facts and evidence necessary to attempt to prove the allegations. Plaintiff Reyes
27 was available whenever her counsel needed her and actively tried to obtain and provide
28 information that would facilitate the pursuit of the PAGA claim. Accordingly, it is appropriate

1 and just for Plaintiff Reyes to receive a Service Award for her services on behalf of the State of
2 California and other Aggrieved Employees, in addition to the settlement payment she will
3 receive as an Aggrieved Employee for her share of the PAGA Penalties Fund.

4 19. Undersigned counsel submits that the PAGA Settlement Agreement fulfills the
5 purpose of the PAGA statute, is within the accepted range of recoveries for this type of litigation,
6 and is fair, reasonable, and adequate given the substantial monetary benefits provided for by the
7 Settlement, the strengths and weaknesses of the cases, and the inherent delay, costs, risks, and
8 uncertainty associated with continued litigation.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11 Executed this 21st day of March 2023, at Glendale, California.

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13 _____
14 Edwin Aiwanian
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EXHIBIT 1

LAWYERS FOR JUSTICE.

September 1, 2021

BY ONLINE SUBMISSION

California Labor & Workforce Development Agency
PAGAfilings@dir.ca.gov

Re: BUNCH OF BULL, INC.; AMIR SAHEBALZAMANY; NASSER ALIABADI

Dear Representative:

We have been retained to represent Amalia Reyes against Bunch of Bull, Inc. (including any and all affiliates, subsidiaries, parents, directors, officers, agents, and executive employees), Amir Sahebalzamany, and Nasser Aliabadi (collectively referred to as “Bunch of Bull”) for violations of California wage-and-hour laws. Ms. Reyes seeks penalties for violations of the California Labor Code, which are recoverable under California Labor Code section 2698, et seq., the Labor Code Private Attorneys General Act of 2004 (“PAGA”) and all other remedies available under PAGA.

Amir Sahebalzamany is a Director of Bunch of Bull. Amir Sahebalzamany, at all times herein relevant, was acting either individually or as an officer, owner, director, agent, or employee of Bunch of Bull who caused and continues to cause all of the wage and hour violations alleged herein against the “aggrieved employees,” as defined herein, including without limitation violations of Labor Code Section 558 and 1197.

Nasser Aliabadi is a director of Bunch of Bull. Nasser Aliabadi, at all times herein relevant, was acting either individually or as an officer, owner, director, agent, or employee of Bunch of Bull, who caused and continues to cause all of the wage and hour violations alleged herein against the “aggrieved employees,” as defined herein, including without limitation violations of Labor Code Section 558 and 1197.

Ms. Reyes seeks these remedies on behalf of the State of California and “aggrieved employees,” as defined herein. This letter is sent in compliance with the reporting requirements of California Labor Code section 2699.3.

Bunch of Bull employed Ms. Reyes as an hourly-paid, non-exempt employee from approximately July 2020 to approximately March 2021, in the State of California.

The “aggrieved employees” that Ms. Reyes may seek penalties on behalf of are all current and former hourly-paid or non-exempt employees who worked for any of the above-referenced entities within the State of California, including, but not limited to all current and former hourly-paid or non-exempt employees who worked for any of the above-referenced entities within the State of California who earned shift differentials/non-discretionary bonuses/non-discretionary

performance pay which was not used to calculate the correct regular rate of pay used to calculate the overtime rate.

The aggrieved employees also include anyone who worked at a Burger King owned, operated, supervised, and/or managed by any of the defendants in California, anyone who worked at any food establishment other than Burger King owned, operated, supervised, and/or managed by any of the Defendants in California, anyone who worked at any food establishment owned, operated, supervised, and/or managed by any of the following companies in California: Amir Sahebalzamany, Inc.; QSR West Development One, Inc.; Central Valley Fast Foods, Inc.; Nor Cal Fast Foods, Inc.; South Bay Fast Foods, Inc.; QSR West Development One, Inc.; Central Valley Fast Foods, Inc.; Nor Cal Fast Foods, Inc.; South Bay Fast Foods, Inc.; QSR West, Inc.; QSR West Development, LLC; High Rollers, Inc.; Amir Sahebalzamany, Inc.; Sahebalzamany and Almasi, Inc.; Central Valley Fast Foods, Inc.; Alimany Holdings, LLC; Shahs of Shiraz, Inc.; BK Gift, Inc.; McKinleyville Restaurant, Inc.; Eureka Fortune, Inc.; Eureka Fast Foods Corp., anyone who worked for any of the following companies in California: Amir Sahebalzamany Real Estate Holdings, Inc.; Millenia Plaza, LLC; QSR West Building, LLC; QSR West Building, Inc.; Oroville Property, LLC; Amir Sahebalzamany, Inc.; QSR West Development One, Inc.; Central Valley Fast Foods, Inc.; Nor Cal Fast Goods, Inc.; Amir Sahebalzamany, Inc.; Sahebalzamany and Almasi, Inc.; Central Valley Fast Goods, Inc.; Alimany Holdings, LLC; Alimany Real Estate Holdings, Inc.; BK Gift, Inc.; Aliabadi Sahebalzamany Real Estate Holdings, Inc.; Shahs of Shiraz, Inc.; Alimany Opportunity Fund, LLC; Orland Property, LLC; McKinleyville Restaurant, Inc.

All of the Companies mentioned above are joint enterprises of Bunch of Bull, Inc., Amir Sahebalzamany, and/or Nasser Aliabadi.

Based on the following facts and theories, Bunch of Bull has violated and/or continues to violate, among other provisions of the California Labor Code and applicable wage law, California Labor Code sections 201, 202, 203, 204, 226(a), 226.7, 510, 512(a), 551, 552, 558, 1174(d), 1194, 1197, 1197.1, 1198, 2800 and 2802, and IWC Wage Orders including *inter alia*, Wage Orders 4-2001 and 5-2001.

Bunch of Bull required aggrieved employees to perform work before their scheduled shifts, after their scheduled shifts, during off-the-clock meal breaks, and/or during rest breaks and failed to compensate aggrieved employees for this time. Such work included, but was not limited to, conducting work-related tasks, responding to work-related inquiries, and conducting closing procedures.

California Labor Code sections 510 and 1198 require employers to pay time-and-a-half or double time overtime wages, and make it unlawful to work employees for hours longer than eight hours in one day and/or over forty hours in one week without paying the premium overtime rates at one-and-one-half times or double the regular rate of pay, including additional remuneration. During the relevant time period, Ms. Reyes and other aggrieved employees worked in excess of 8 hours in a day and 40 hours in a week. Therefore, Ms. Reyes and other aggrieved employees were entitled to receive certain wages for overtime compensation, but they were not paid for all overtime hours worked.

California Labor Code sections 226.7 and 512 require employers to pay an employee one additional hour of pay at the employee's regular rate for each meal or rest period that is not provided. During the relevant time period, Bunch of Bull required Ms. Reyes and other aggrieved employees to work during meal and rest periods and failed to compensate them properly for non-compliant meal and rest periods including, *inter alia*, short, late, interrupted, and missed meal and rest periods. Bunch of Bull also required aggrieved employees to stay on work premises during rest periods.

California Labor Code sections 201 and 202 provide that if an employer discharges an employee, the wages earned and unpaid at the time of discharge are due and payable immediately, and if an employee quits his or her employment, his or her wages shall become due and payable not later than seventy-two (72) hours thereafter, unless the employee has given seventy-two (72) hours' notice of his or her intention to quit, in which case the employee is entitled to his or her wages at the time of quitting. During the relevant time period, Bunch of Bull failed to pay Ms. Reyes and other aggrieved employees all wages due to them within any time period specified by California Labor Code sections 201 and 202, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 204 requires that all wages earned by any person in any employment between the 1st and the 15th days, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 16th and the 26th day of the month during which the labor was performed, and that all wages earned by any person in any employment between the 16th and the last day, inclusive, of any calendar month, other than those wages due upon termination of an employee, are due and payable between the 1st and the 10th day of the following month. California Labor Code section 204 also requires that all wages earned for labor in excess of the normal work period shall be paid no later than the payday for the next regular payroll period. During the relevant time period, Bunch of Bull failed to pay Ms. Reyes and other aggrieved employees all wages due to them within any time period specified by California Labor Code section 204, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 226 requires employers to make, keep and provide complete and accurate itemized wage statements to their employees. During the relevant time period, Bunch of Bull did not provide Ms. Reyes and other aggrieved employees with complete and accurate itemized wage statements. The wage statements they received from Bunch of Bull were in violation of California Labor Code section 226(a). The violations include, but are not limited to, the failure to include the total hours worked by Ms. Reyes and other aggrieved employees, including time spent working off-the-clock and during meal and rest periods as discussed above.

California Labor Code sections 551 and 552 require that every person employed in any occupation of labor is entitled to one day's rest in a seven-day workweek, that no employer of labor shall cause his employees to work more than six days in a workweek, and that an employer shall pay a civil penalty in the amounts of fifty dollars (\$50) for each aggrieved employee per pay period for the initial violation and one hundred dollars (\$100) for each aggrieved employee per pay period for each subsequent violation. During the relevant time period, Ms. Reyes and the aggrieved employees were required to regularly and/or consistently work in excess of six (6) days in a workweek. During the relevant time period, Ms. Reyes and the aggrieved employees were

required to work in excess of thirty (30) hours in a week and/or six (6) hours in any one (1) day thereof, during workweeks in which they were required to work in excess of six (6) days. During the relevant time period, Ms. Reyes and the aggrieved employees were required to work in excess of six (6) days in a workweek without accumulating or being provided the opportunity to take at least one (1) day of rest, and when Ms. Reyes and the aggrieved employees accumulated days of rest, they were not actually provided the opportunity to take the equivalent of one (1) day's rest in seven (7) during each calendar month.

California Labor Code sections 1174(d) requires an employer to keep, at a central location in the state or at the plants or establishments at which employees are employed, payroll records showing the hours worked daily by and the wages paid to, and the number of piece-rate units earned by and any applicable piece rate paid to, employees employed at the respective plants or establishments. These records shall be kept with rules established for this purpose by the commission, but in any case shall be kept on file for not less than two years. During the relevant time period, Bunch of Bull failed to keep accurate and complete payroll records showing the actual hours worked daily and the wages earned by Ms. Reyes and other aggrieved employees, including earned and unpaid minimum, overtime, and premium wages as discussed above.

California Labor Code section 2810.5 requires an employer to provide written notice to an employee, at the time of hiring, containing the following information:

The rate or rates of pay and basis thereof, whether paid by the hour, shift, day, week, salary, piece, commission, or otherwise, including any rates for overtime, as applicable. Allowances, if any, claimed as part of the minimum wage, including meal or lodging allowances. The regular payday designated by the employer in accordance with the requirements of this code. The name of the employer, including any "doing business as" names used by the employer. The physical address of the employer's main office or principal place of business, and a mailing address, if different. The telephone number of the employer. The name, address, and telephone number of the employer's workers' compensation insurance carrier. That an employee: may accrue and use sick leave; has a right to request and use accrued paid sick leave; may not be terminated or retaliated against for using or requesting the use of accrued paid sick leave; and has the right to file a complaint against an employer who retaliates. Any other information the Labor Commissioner deems material and necessary.

Bunch of Bull failed to accurately provide aggrieved employees with the requisite notice in violation of California Labor Code section 2810.5.

California Labor Code sections 1194, 1197, and 1197.1 provide the minimum wage to be paid to employees, and the payment of a lesser wage than the minimum so fixed is unlawful. During the relevant time period, Bunch of Bull did not provide Ms. Reyes and other aggrieved employees with the minimum wages to which they were entitled for work performed "off-the-clock."

California Labor Code section 1198 provides that “The employment of any employee ... under conditions of labor prohibited by the [Industrial Wage Orders] is unlawful.” The applicable Industrial Wage Orders, including *inter alia*, Wage Orders 4-2001 and 5-2001, require that for each workday an employee is required to report for work and does report, but is not put to work or is furnished less than half said employee’s usual or scheduled day’s work, the employee shall be paid for half the usual or scheduled day’s work, but in no event for less than two (2) hours nor more than four (4) hours, at the employee’s regular rate of pay. Further, if an employee is required to report for work a second time in any one workday and is furnished less than two (2) hours of work on the second reporting, said employee shall be paid for two (2) hours at the employee’s regular rate of pay. During the relevant time period, Bunch of Bull failed to pay Ms. Reyes and other aggrieved employees half the usual or scheduled day’s work in an amount no less than two (2) hours nor more than four (4) hours at the employee’s regular rate of pay for workdays in which Ms. Reyes and the other aggrieved employees reported to work and were furnished less than half the usual or scheduled day’s work. During the relevant time period, Bunch of Bull failed to pay Ms. Reyes and other aggrieved employees for two (2) hours at the employee’s regular rate of pay on days in which Ms. Reyes and the other aggrieved employees were required to report for work a second time in one workday and were furnished less than two (2) hours of work upon the second reporting.

California Labor Code sections 2800 and 2802 require an employer to reimburse its employee for all necessary expenditures incurred by the employee in direct consequence of the discharge of his or her job duties or in direct consequence of his or her obedience to the directions of the employer. During the relevant time period, Ms. Reyes and other aggrieved employees incurred necessary business-related expenses and costs that were not fully reimbursed by Bunch of Bull. These costs include, but are not limited to, the use of personal phones for work-related purposes, the use of personal vehicles for work-related purposes, the purchasing and maintenance of clothing in compliance with the dress code, and the purchasing and maintenance of shoes in compliance with the dress code.

Therefore, on behalf of all aggrieved employees, Ms. Reyes seeks all applicable penalties arising out of the above-referenced wage, hour, and payroll practices, or which could be assessed and collected by the Labor and Workforce Development Agency, for violation of the California Labor Code pursuant to PAGA, including civil penalties pursuant to Labor Code section 558.

If you have any questions or require additional information, please do not hesitate to contact us. Thank you for your attention to this matter and the noble cause you advance each and every day.

With kind regards,


Edwin Aiwazian, Esq.

Cc: (By U.S. Certified Mail / Return Receipt Requested)

Bunch of Bull, Inc.
c/o Nasser Aliabadi
Agent for Service of Process
7011 Koll Center Phwy, Ste 150
San Ramon, CA 94583

Amir Sahebalzamany
7011 Koll Center Phwy, Ste 150
San Ramon, CA 94583

Nasser Aliabadi
7011 Koll Center Phwy, Ste 150
San Ramon, CA 94583

EXHIBIT 2

AMALIA REYES V. BUNCH OF BULL, INC., ET AL.
(ALAMEDA COUNTY SUPERIOR COURT CASE NO. 21CV002239)

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Pre-Lawsuit Investigation of the Key Facts with a Focus on the Merits of Plaintiff Amalia Reyes's ("Plaintiff Reyes") Private Attorneys General Act ("PAGA") Claims on Behalf of the State of California With Respect to Plaintiff Reyes and the Aggrieved Employees	8.10
Pre-Lawsuit Investigation of Potential Civil Penalties Exposure of Defendants with Respect to Plaintiff Reyes and the Aggrieved Employees	7.40
Legal Research and Analysis of Latest Off-the-Clock, Meal and Rest Breaks, Representative PAGA, and Joint Employer/Alter Ego Theory Decisions in California, Including all New and Relevant DLSE Materials	6.80
Investigation of Defendants, Defendants' Business Relationships, and the Industry in which Defendants Operate	4.20
Investigation of Defendants' Organizational and Corporate Structure, and Executive Reporting Structure, as They Relate to the Employment and Management of the Aggrieved Employees	3.10
Investigation of Defendants' Executives, Officers, and Leadership with a Focus on Involvement in Wage-and-Hour Issues and Establishing Willfulness and Uniformity, and Research and Analysis of Defendants' Litigation History Involving Wage-and-Hour Issues and Other Related Employment Issues	3.90

Analysis of Competitors in Various Relevant Geographic Areas within which Defendants Operate, and Comparing and Contrasting Defendants' Policies, Practices, and Procedures with the Policies, Practices, and Procedures of Defendants' Competitors	3.70
Research and Investigation Re: Location(s), Division(s), and/or Department(s) Owned, Managed, Serviced, and/or Operated by Defendants in California, Including Differences Between Them to Determine Whether Those Differences Will Cause Individual Issues to Predominate Over Common Issues	5.10
Research and Investigation Re: Workforce, Staffing Models, and Staffing Levels at Locations At Which Aggrieved Employees Worked Throughout California	4.60
Research and Investigation Re: Defendants' Written and Non-Written Policies, Practices, and Procedures Relating to Non-Discretionary Bonus/Incentive/Performance/Shift Differential Pay, Reporting Time Pay, Timekeeping, Opening and Closing Procedures, COVID-19 Screening, Customer Service, Scheduling and Attendance, Day of Rest, Meal/Rest Breaks, On Premises Breaks, Meal Waivers, Meal/Rest Premiums, Overtime Compensation, Training, Cleaning, Health and Food Safety, Uniform/Dress Code, Footwear, PPE, Equipment/Supplies, Use of Personal Vehicle, Reimbursement of Business-Related Expenses, and Arbitration Agreements	12.50
Research and Investigation Re: Various Software Programs, Systems, and Other Technology Defendants Use to Conduct Everyday Business, Including Timekeeping, Payroll, Order Management, Customer Relations Management, Point of Sale/Cashier, Inventory, Security, and Surveillance Systems, with a Focus on What Documents (Both Paper and Electronic) Are Created in the Normal Course of Business Relating to Overtime Worked, Off-the-Clock Time Worked Pre/Post-Shift, and Time Worked During Meal Breaks	4.20
Research and Analysis of Potential Defenses Defendants May Raise, Including <i>De Minimis</i> Work, Non-Compensable Off-the-Clock Work, Waiver, and Compliant Policies	7.30

Research and Investigation Regarding Trial Manageability Issues, including Research Regarding Which Experts to Retain and For What Purpose	4.50
Prepare a Discovery Strategy and Plan of Action, including Topics of Inquiry Important to Liability and Civil Penalties	3.80
Research and Investigation of Impact of COVID-19 Pandemic on Defendants, Their Operations, and Aggrieved Employees' Work	5.40
Meet and Communicate with Plaintiff Amalia Reyes Throughout the Pendency of the Case	48.10
Investigate, Meet, and/or Communicate with Aggrieved Employees and Percipient Witnesses	13.50
Pleadings and Court Filings	
Draft Plaintiff Reyes's Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. and Legal Research and Analysis of All Allegations Involved (filed on November 9, 2021)	7.30
Review Court's Notice of Case Assignment and Notice of Hearing (filed on November 9, 2021)	0.10
Review and Analyze Defendants' Answer to Plaintiff Reyes's Complaint and Research Affirmative Defenses in Answer (served on December 21, 2021)	1.60
Review Defendants' Case Management Statement (served on February 16, 2022)	0.20
Draft Plaintiff Reyes's Case Management Statement (filed on February 22, 2022)	0.90
Review Court's Minute Order Re: Initial Case Management Conference and Court Order Re: Initial Case Management Conference (filed on March 3, 2022)	0.10

Meet and Confer with Defendants' Counsel and Draft Joint Stipulation to Continue Case Management Conference; and [Proposed] Order (submitted on May 19, 2022)	0.90
Review Court's Order Granting Joint Stipulation to Continue Case Management Conference and Order Re: Case Management Order (filed on May 25, 2022)	0.10
Meet and Confer with Defendants' Counsel and Draft Joint Case Management Conference Statement and Notice of Settlement (filed on October 3, 2022)	0.70
Review Court's Notice of Case Rescheduling or Relocation (filed on October 14, 2022)	0.10
Meet and Confer with Defendants' Counsel and Review and Revise Joint Case Management Conference Statement (filed on February 8, 2023)	0.50
Review Court's Case Management Order (filed on February 22, 2023)	0.10
Appearances	
Prepare for and Telephonically Attend Case Management Conference (March 3, 2022)	0.50
Prepare for and Telephonically Attend Hearing on Motion for Court Approval of the Parties' PAGA Settlement (Anticipated)	1.50
Discovery and Deposition	
Draft Letter to Defendant Nasser Aliabadi Re: Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Amalia Reyes (served on July 30, 2021)	1.90
Review and Analyze Documents Produced by Defendants in Response to Request for Personnel Files, Pay Stubs, and Time Records for Plaintiff Amalia Reyes (served on August 11, 2021)	4.20

Draft Plaintiff's Form Interrogatories – General (Set One) to Defendant Bunch of Bull, Inc., (not served)	0.90
Letters and Correspondence	
Draft Notice to California Labor and Workforce Development Agency re: Claims of Plaintiff Amalia Reyes for Penalties Under California Labor Code section 2698, <i>et seq.</i> (served on September 1, 2021)	4.10
Meet and Confer with, Draft Correspondence to, and Respond to Correspondence from, Defendants' Counsel	15.50
Mediation/Settlement	
Review and Analyze Documents, Data, and Information Obtained from Plaintiff Reyes, Defendants, and Other Sources and Evaluate Claims, Including, <i>Inter Alia</i> , Calculating PAGA Penalties for Violation Rates for Non-Compliant Meal and Rest Breaks, Unpaid Wages, Failure to Pay Premium Pay, and Incomplete or Inaccurate Wage Statements	16.50
Prepare for and Attend Mediation Session (August 24, 2022; Zoom Video Conference)	13.50
Review, Revise, Negotiate, and/or Finalize PAGA Settlement Term Sheet (fully executed on September 22, 2022)	1.20
Review, Revise, Negotiate, and/or Finalize PAGA Settlement Agreement (fully executed on February 16, 2023)	1.80

Law and Motion	
Research, Revise, Review, and/or Draft Motion for Court Approval of the Parties' PAGA Settlement, Declaration of Edwin Aiwarzian in Support Thereof, and Declaration of Amalia Reyes in Support Thereof	4.30
Total Hours:	224.70

EXHIBIT 3

LAWYERS for JUSTICE PC CASE COST DETAIL
Reyes v. Bunch of Bull (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
11/9/2021	Legal Document Server, Inc.	Attorney Service	37.44
11/9/2021	Alameda Superior Court	Court Filing Fee	435.00
11/11/2021	ProLegal	Attorney Service	463.25
12/23/2021	Alameda Superior Court	Document Download Fee	11.00
1/27/2022	Legal Document Server, Inc.	Attorney Service	17.95
2/22/2022	One Legal	Attorney Service	19.51
2/22/2022	General Logistics Systems US, Inc.	Courier Service	21.08
5/13/2022	Legal Document Server, Inc.	Attorney Service	167.54
5/18/2022	General Logistics Systems US, Inc.	Courier Service	20.23
5/19/2022	Legal Document Server, Inc.	Attorney Service	11.00
5/19/2022	Legal Document Server, Inc.	Attorney Service	19.30
5/19/2022	Alameda Superior Court	Filing Fee	20.00
10/10/2022	Legal Document Server, Inc.	Attorney Service	18.70
2/3/2023	Alameda Superior Court	Document Download Fee	3.00
2/9/2023	General Logistics Systems US, Inc.	Courier Service	27.17
5/1/2023	Alameda Superior Court	Document Download Fee	1.00
Total:			1,293.17